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January 4, 2025

**VIA ECF**

Honorable Jeannette A. Vargas  
Daniel Patrick Moynihan United States Courthouse  
500 Pearl St.  
New York, NY 10007-1312

**RE: Defendant BAM Trading Services Inc. d/b/a Binance.US’ (“Binance.US”) Motion For Extension of Time Regarding Date to Respond to the Amended Complaint, Proposed Briefing Schedule, *Troell et al. v. Binance Holdings Ltd. et al.*, Civil Action No.: 1:24-cv-07136 (JAV)**

Dear Judge Vargas,

This law firm represents Defendant Binance.US in the above-referenced action. Pursuant to Local Civil Rule 7.1(e) and Your Honor’s Individual Rule 3(E), Binance.US respectfully moves this Court for a 30-day extension of time for it to answer, move with respect to, or otherwise respond to Plaintiffs’ Amended Complaint from the current deadline of January 6, 2025, through and including February 6, 2025. In doing so, Binance.US reserves all of its defenses and objections, including as to jurisdiction.

This is Binance.US’ first request for an extension of time. Counsel for Defendant Binance Holding Limited (“BHL”) consents to this extension request through February 6, 2025. Counsel for Plaintiffs consents to an extension from January 6 until January 30, 2025.

There is good cause for Defendant Binance.US’ requested extension. First, counsel for Binance.US promptly made their appearance in the case on New Year’s Eve, soon after being retained in the litigation. That same evening, Binance.US’ counsel contacted counsel for the other parties to request a conference.

As further good cause for this Motion, while Binance.US intends to join in BHL’s pending Motion to Dismiss where feasible, it is unable to do so on every point because Binance.US has dispositive arguments not applicable to or not made by Defendant BHL. If Binance.US were simply echoing arguments in BHL’s Motion to Dismiss, an extension of time would not be necessary. Binance.US needs the additional time to address its independent arguments regarding Plaintiffs’ 900-page Amended Complaint.



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We note that Binance.US has offered to Plaintiffs additional time to respond to its Motion, though Plaintiffs have not sought an extension from Binance.US.

Accordingly, Binance.US respectfully requests that the Court extend, to and through February 6, 2025, its time to answer, move with respect to, or otherwise respond to the Complaint in this action, reserving all of Binance.US' defenses and objections, including as to jurisdiction.

Sincerely,

A handwritten signature in black ink, appearing to read "Alexandra E. Chopin".

Alexandra E. Chopin

cc: Daniel T. Stabile, Esq.  
All counsel of record (w/encls.) (by ECF)